

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:	*	CASE NO.: 21-53052-SMS
	*	
THERESA SUE READY,	*	CHAPTER 7
	*	
DEBTOR.	*	

MOTION TO CONVERT CHAPTER 7 CASE TO CHAPTER 13 CASE

COMES NOW **THERESA SUE READY**, Debtor in the above-styled Chapter 7 case, by and through undersigned counsel, and moves this Honorable Court, pursuant to 11 U.S.C. § 706(a), to convert the above-styled Chapter 7 case to a proceeding under 11 U.S.C. Chapter 13 of the Bankruptcy Code. The Debtor is entitled to convert her case because:

1. This case, filed on April 15, 2021, has not been previously converted under 11 U.S.C. §§ 1112 or 1307 of the Bankruptcy Code.

2. Debtor is eligible to be a debtor under Chapter 13 of the Bankruptcy code.

WHEREFORE, Debtor prays that this

- (a) Motion to Convert Case to Chapter 13 be filed, read, and considered;
- (b) Honorable Court grant this Motion to Convert Case to Chapter 13; and

(c) Honorable Court grant such other and further relief as it may deem just and proper.

Respectfully submitted,

/s/

Ronna M. Woodruff
Attorney for Debtor
GA Bar No. 108910

WOODRUFF LAW LLC
123 Powers Ferry Road, S.E.
Marietta, GA 30067
(770) 565-7924
(770) 565-7930 (Fax)

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DEBTOR.	*	

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that under penalty of perjury that on this day I have served the following parties with a copy of the attached “Debtor’s Motion to Convert Chapter 7 Case to Chapter 13 Case” by placing true and correct copies of same in the United States Mail with adequate postage affixed to insure delivery, addressed to:

S. Gregory Hays
Chapter 7 Trustee
2964 Peachtree Road, Ste. 555
Atlanta, GA 30305
VIA ECF

Theresa S. Ready
2209 Winding Creek Lane, S.W.
Marietta, GA 30064

Dated this 7th day of June, 2021

WOODRUFF LAW LLC
123 Powers Ferry Road, S.E.
Marietta, GA 30067
770-565-7924
770-565-7930 (Fax)

/s/_____
Ronna M. Woodruff
Attorney for Debtor
GA Bar No. 108910

Plus all creditors on the attached matrices

Label Matrix for local noticing
113E-1
Case 21-53052-sms
Northern District of Georgia
Atlanta
Mon Jun 7 15:57:25 EDT 2021

(p)BANK OF AMERICA
PO BOX 982238
EL PASO TX 79998-2238

Barclays Bank Delaware
Post Office Box 8803
Wilmington, DE 19899-8803

Brand Source/Citi/CBNA
5800 South Corporate Pl.
Sioux Falls, SD 57108-5027

Capital One/Walmart
Post Office Box 31293
Salt Lake City, UT 84131-0293

Comenity Bank/Victoria Secret
Post Office Box 182789
Columbus, OH 43218-2789

(p)DSNB MACY S
CITIBANK
1000 TECHNOLOGY DRIVE MS 777
O FALLON MO 63368-2222

(p)GEORGIA DEPARTMENT OF REVENUE
COMPLIANCE DIVISION
ARCS BANKRUPTCY
1800 CENTURY BLVD NE SUITE 9100
ATLANTA GA 30345-3202

S. Gregory Hays
Hays Financial Consulting, LLC
Suite 555
2964 Peachtree Road
Atlanta, GA 30305-4909

Internal Revenue Service
Post Office Box 7346
Centralized Insolvency Unit
Philadelphia, PA 19101-7346

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

Lending Club Corp.
595 Market Street, Ste. 200
San Francisco, CA 94105-2807

Office of the United States Trustee
362 Richard Russell Building
75 Ted Turner Drive, SW
Atlanta, GA 30303-3315

(p)PNC BANK RETAIL LENDING
P O BOX 94982
CLEVELAND OH 44101-4982

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Theresa Sue Ready
2209 Winding Creek Lane, S.W.
Marietta, GA 30064-2832

SYNCB/BP
Post Office Box 965024
Orlando, FL 32896-5024

SYNCB/Chevron
Post Office Box 965015
Orlando, FL 32896-5015

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

The Home Depot/CBNA
5800 South Corporate Place
Sioux Falls, SD 57108-5027

(p)US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

United States Attorney
Northern District of Georgia
75 Ted Turner Drive SW, Suite 600
Atlanta GA 30303-3309

Wells Fargo Card Services
Post Office Box 14517
Des Moines, IA 50306-3517

Ronna M. Woodruff
Woodruff Law LLC
123 Powers Ferry Road, SE
Marietta, GA 30067-7557

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Bank of America
Post Office Box 982238
El Paso, TX 79998

DSNB/Macy's
Post Office Box 8218
Mason, OH 45040

Georgia Department of Revenue
Compliance Div.ARCs Bankruptcy
1800 Century Blvd., #9100
Atlanta, GA 30345

JPMCB Card Services
Post Office Box 15369
Wilmington, DE 19850

PNC Bank
Post Office Box 3180
Pittsburgh, PA 15230

US Bank
Post Office Box 108
Saint Louis, MO 63166

End of Label Matrix
Mailable recipients 23
Bypassed recipients 0
Total 23